September 29, 2015

Mr. Kelly Hepler Chair, National Fish Habitat Board C/o Association of Fish and Wildlife Agencies 444 N. Capitol Street NW, Suite 725 Washington, DC 20001

#### Dear Mr. Hepler:

The Pacific Lamprey Conservation Initiative requests recognition as a candidate partnership known as the Pacific Lamprey Fish Habitat Partnership (PLFHP) under the National Fish Habitat Action Plan (NFHAP). We are requesting recognition now to create a relationship that explores becoming an approved partnership in the NFHAP.

The NFHAP identifies the importance and value of increasing the quality and quantity of fish habitats that support a broad natural diversity of fish and other aquatic species. One method to greatly enhance the protection and restoration of these aquatic habitats is through the creation of Fish Habitat Partnerships. Formation of the PLFHP would address gaps in habitat restoration that would widely improve Pacific Lamprey populations. Because of lampreys' unique life history and ecological role the effort should broaden the natural diversity and improve habitats for other aquatic species. Consistent with national NFHAP goals, the PLFHP would focus on: 1) increasing access to and improving spawning habitat; 2) improving connectivity and condition of larval rearing habitat; 3) increasing access to and improving overwintering habitat; and 4) improving migration conditions for all life stages of lamprey throughout West Coast Rivers from California, Oregon, Washington, Idaho and Alaska. There is keen interest by numerous Native American tribes in the conservation and restoration of Pacific Lamprey throughout the U.S. range. The critical ecological role that lamprey play in these rivers and the strong tribal cultural importance, supports the candidacy of Pacific Lamprey for a Fish Habitat Partnership. Because of these unique strengths, we believe the PLFHP would also benefit the NFHAP program and existing partnerships.

The formation of this partnership was solidified in 2012, when 11 tribes; the states of Washington, Oregon, Idaho, California and Alaska; seven federal agencies; and multiple regional entities signed the Pacific Lamprey Conservation Agreement. The approach of the Initiative is a three part process: an Assessment and Template for Conservation Measures (Assessment); the Conservation Agreement (Agreement); and Regional Implementation Plans.

The Agreement is a voluntary commitment to collaborate on efforts that reduce or eliminate threats to Pacific Lamprey to the greatest extent possible. The goal of the Agreement is to achieve long term persistence and support traditional tribal cultural use of Pacific Lamprey throughout their U.S. range. The Agreement provides a mechanism for interested parties to pool available resources to expeditiously and effectively implement conservation actions identified in Regional Implementation Plans. The PLFHP would greatly enhance the ability to effectively implement habitat actions. The PLFHP will use the existing infrastructure of the Agreement, which is comprised of tribal, state, Federal, regional and local representatives, to manage and coordinate this effort. Please see Appendix 1, which describes how the Pacific Lamprey Conservation Initiative is working towards meeting the requirements for establishing the Pacific Lamprey Fish Habitat Partnership.

#### Goals of the PLFHP:

- 1. To achieve formal recognition as a NFHAP partnership that focuses on the restoration and conservation of Pacific Lamprey habitats throughout their U.S. range.
- 2. The PLFHP will augment existing Fish Habitat Partnerships such as the Western Native Trout Initiative and the Pacific Marine Estuarine Partnership to:
  - a. identify the gaps in existing salmonid restoration efforts to restore Pacific Lamprey habitat;
  - b. implement habitat restoration that improves lamprey populations to support traditional tribal cultural use of Pacific Lamprey;
  - c. implement habitat restoration that restores Pacific Lamprey populations to accomplish ecosystem function;
  - d. take advantage of the relatively low cost and efficiency of lamprey habitat improvement projects when integrated with salmonid restoration efforts. Past experience has shown high funding match on projects when coordinated with existing partnerships;
  - e. consider habitat action prioritization through the lens of climate change by taking advantage of established connections with the North Pacific Landscape Conservation Cooperative who is funding a Pacific Lamprey climate change vulnerability assessment; and
  - f. fill geographic gaps not filled by existing partnerships.

The goals of the PLFHP are consistent with the NFHAP Goals:

- 1. Protect and maintain healthy aquatic systems;
- 2. Prevent further declines of fish habitat;
- 3. Reverse declines in the quantity and quality of fish habitats; and

4. Increase the quality and quantity of fish habitats that support a broad natural diversity of fish and other aquatic species.

#### Partner Support for the PLFHP:

- 1. Conservation Agreement signatories and supporters includes 11 tribes; the states of Washington, Oregon, Idaho, California and Alaska; seven federal agencies, and multiple regional entities.
- 2. U.S. Fish and Wildlife Regions 1, 7, and 8.
- 3. A number of tribes, NGOs, and local organizations that are collaborating with the Conservation Agreement.

Next steps for the development of this candidate partnership include:

- 1. Integrate the PLFHP with the restoration strategies identified in the Initiative's Regional Implementation Plans to accomplish the identified goals.
- 2. Use the Pacific Lamprey Assessment and Regional Implementation Plans to identify gaps in restoration for guiding habitat conservation actions.
- 3. Pursue funding for a set of habitat restoration actions through the synthesis identified above, consistent with the NFHAP mission.
- 4. The Conservation Team, composed of signatories and supporters of the Agreement, will serve as the PLFHP steering committee to develop material for potential nomination as a full partnership.

In summary, the formation of the PLFHP will be a key component in helping prioritize and assist in funding conservation actions for Pacific Lamprey. This is an important phase for supporting the partnership of the fishery management agencies of five Pacific states, tribes and other organizations to help fund high priority habitat restoration actions for Pacific Lamprey.

Restoration efforts for Pacific Lamprey will directly benefit other lamprey species throughout US Fish and Wildlife regions 1, 7, and 8. Healthy Pacific Lamprey populations will improve ecosystem function that will support the restoration of the other native fish, and aquatic species. By engaging numerous tribes in lamprey restoration and directly recognizing tribal cultural, religious, and subsistence importance; the partnership will continue to receive strong support. The tribes of California and the Pacific Northwest have the ability to influence political decisions for fish and habitat restoration. The tribal support of and investment in the PLFHP has the potential to elevate the importance of the NFHAP program nationally, and benefit the NFHAP program and other existing partnerships.

As required by the "Guidance for establishing Fish Habitat Partnerships under the National Fish Habitat Action Plan" we have addressed how the PLFHP is working to meet the criteria in the

Guidance (Appendix 1). We hope you will consider the PLFHP as a candidate partnership and we look forward to working with the Board and members of the NFHAP.
Sincerely,
Howard Schaller and Bob Rose
Co-Chairs of the Conservation Team of the Pacific Lamprey Conservation Initiative
Randy Fisher
Executive Director of the Pacific States Marine Fisheries Commission

# Appendix 1 - Requirements for Establishing Fish Habitat Partnerships – Section 2 of Policy and Guidance for Fish Habitat Partnerships

#### Strong and Diverse Partnerships

- 1. The Pacific Lamprey Conservation Initiative (PLCI) is a self-run collaboration of partners working to conserve Pacific Lamprey (an ecological significant species to the rivers of the west coast of the U.S.) throughout its U.S. range (California, Oregon, Washington, Idaho and Alaska).
- 2. The PLCI is comprised of a diverse group of public partners including federal, state, municipal, and local agencies and Native American Tribes and private organizations such as watershed councils and landowners. The partners are organized into a Conservation Team which operates the PLCI across the U.S range of Pacific Lamprey.
- 3. The PLCI Conservation Agreement (USFWS 2012) was signed by fish and wildlife agencies from California, Oregon, Washington, and Idaho. Alaska Fish and Game sent a letter of support. Eleven Native American Tribes and 7 federal agencies also signed the Agreement.
- 4. See #3 regarding signing of Conservation Agreement. Regional implementation plans are under development throughout U.S. range of Pacific Lamprey. Signatories and supporters of the Agreement serve on regional implementation plan teams.
- 5. The PCLI is organized into four committees (Policy Committee, Conservation Team, Regional Management Unit Groups and Lamprey Technical Workgroup) that carry out Strategic Habitat Conservation (SHC) planning for Pacific Lamprey across the U.S. range of Pacific Lamprey and partners (see Figure 1 below).
- 6. The PLCI seeks a NFHAP partnership under the name of Pacific Lamprey Fish Habitat Partnership (PLFHP).

#### Geographic Focus

1. The geographic scope of the PCLI is California, Oregon, Washington, Idaho and Alaska. Habitats included in the PLCI are freshwater tributary and mainstem habitats including migration corridors, estuaries and marine environments. The PLCI augments existing NFHAP partnerships because: 1) the Pacific Marine Estuary Partnership focuses on estuaries so there is no coverage upstream or in Alaska or Idaho; 2) the California Fish Passage Forum does not include Alaska, Washington, Oregon or Idaho; 3) the Western Native Trout Initiative focuses on native trout species and large areas of California are not included; and 4) the PLFHP will include habitats unique to lamprey.

- 2. The scope of issues and priorities for Pacific Lamprey are: geographically large; unique in cultural importance to Native American Tribes; and ecologically significant to ecosystem health.
- 3. The geographic scope of the PCLI greatly exceeds 50,000 square miles.

#### Strategic Planning

- 1. The PLCI Assessment (Luzier 2011; Goodman and Reid 2012) identified major and minor threats in all regional management units throughout the U.S. range of Pacific Lamprey. The Regional Implementation Plans identify needed actions and research to address those threats by life stage and habitat. The needs identified in Regional Implementation Plans are consistent with NFHAP national goals: 1) protect and maintain healthy aquatic systems; 2) prevent further declines of fish habitat; 3) reverse declines in the quantity and quality of fish habitats; and 4) increase the quality and quantity of fish habitats that support a broad natural diversity of fish and other aquatic species.
- 2. The PLCI completed Assessments (Luzier 2011; Goodman and Reid 2012). The Assessment describes the risk of Pacific Lamprey in 17 regional management units and identifies demographic and threat information. The Conservation Agreement (USFWS 2012) and supporting Interim Operating Guidelines (2015; see attachment) provide a goal for the collaborative agreement and strategic plan for implementation of regionally based conservation actions and research, monitoring and evaluation. The Regional Implementation Plans currently in development outline specific conservation actions and research needs prioritized based on alignment to identified threats, feasibility, benefit and partner engagement. Draft plans already exist for 8 of 17 regional management units.
- 3. The PLCI will augment existing FHPs (see #1 under Geographic Focus) and PLCI restoration efforts should benefit other FHP species and shared geographic areas. However, we will schedule regular meetings with neighboring FHPs to ensure synchrony of conservation goals. Representatives from other FHPs will be invited to attend PLCI Conservation Team meetings.

#### Capabilities for Scientific Assessment

The PCLI is based on Strategic Habitat Conservation principles (Figure 2). The
organizational structure (see #5 under Strong and Diverse Partnerships) and products
(Assessment, Conservation Agreement and Regional Implementation Plans) are
designed in an adaptive management framework so regular evaluation of progress and
necessary corrections are possible.

#### References

- Goodman, D. H. and S. B. Reid. 2012. Pacific Lamprey (Entosphenus tridentatus) Assessment and Template for Conservation Measures in California. U.S. Fish and Wildlife Service, Arcata, California. 117 pp. http://www.fws.gov/arcata/fisheries/reports/technical/PLCI\_CA\_Assessment\_Final.pdf
- Luzier, C.W., H.A. Schaller, J.K. Brostrom, C. Cook-Tabor, D.H. Goodman, R.D. Nelle, K. Ostrand and B. Streif. 2011. Pacific Lamprey (Entosphenus tridentatus) Assessment and Template for Conservation Measures. U.S. Fish and Wildlife Service, Portland, Oregon. 282 pp. http://www.fws.gov/columbiariver/publications.html
- USFWS (U.S. Fish and Wildlife Service). 2012. Pacific Lamprey Conservation Agreement. U.S. Fish and Wildlife Service, Portland, Oregon. 57 pp. http://www.fws.gov/pacific/Fisheries/sphabcon/Lamprey/lampreyCI.html

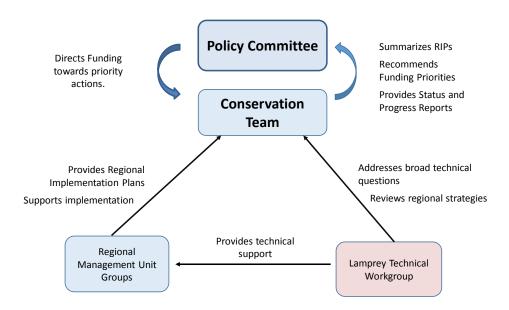


Figure 1. Organizational chart for the Pacific Lamprey Conservation Initiative.

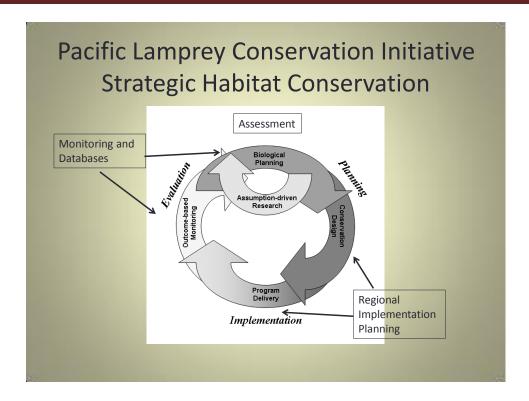


Figure 2. Pacific Lamprey Conservation Initiative and the application to Strategic Habitat Conservation principles.